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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
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12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 CHARLENE SCOTT,
16 Defendant.
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Case No. 2:15-cr-00174-KJD-BNW

**Stipulation To Continue
Government's Deadline To File A
Response To Defendant's Motion and
Motion Supplement for
Compassionate Release**
(ECF 461 and 473)

(Second Request)

20 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
21 Frierson, United States Attorney, and Kimberly M. Frayn, Assistant United States
22 Attorney, counsel for the United States of America, and Heidi Ojeda, Assistant Federal
23 Public Defender, that the government's time to respond to the defendant's Motion and
24 Motion Supplement for Compassionate Release (ECF 461 and 473) shall be extended to
25 and including June 21, 2024, for the following reasons:
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1 1. In January 2024, defendant filed a *pro se* motion for compassionate release.
2 ECF 461. In it, Charlene Scott (“Scott” or “defendant”) raised several reasons she
3 believed early release from custody was warranted. On May 7, 2024, the defense counsel
4 filed a supplement to the motion, along with an exhibit containing Scott’s husband’s
5 medical records. ECF 473, and 474.
6

7 2. The defendant’s husband’s medical issues are alleged to be extensive, and
8 the government needs additional time to review and understand the medical records
9 provided by the defendant in support of her motion.
10

11 3. Additionally, as defendant’s motion states, there are approximately six
12 years of pleadings and procedural history to review, all of which is directly relevant to the
13 basis underlying the defendant’s motion for compassionate relief.

14 4. Accordingly, more time is needed for the government to review the
15 pleadings and other relevant records, conduct any necessary follow up investigation, and
16 to research and draft an appropriate response.
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18 5. The defendant is in BOP custody and does not object to the government’s
19 request. The parties agree to the extension of time.

20 6. This is the government’s second request to extend the filing deadline to file
21 a responsive pleading to relating to the defendant’s compassionate release request. The
22 parties have agreed that the government shall have up to and including June 21, 2024, in
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1 which to file its response. The additional time requested herein is not sought for purposes
2 of delay, but merely to allow the government sufficient time to file its response.

3 DATED this 7th day of June, 2024.

4
5 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

6
7 */s/ Heidi Ojeda*

/s/ Kimberly M. Frayn

8 By _____
9 HEIDI OJEDA
Assistant Federal Public Defender

By _____
KIMBERLY M. FRAYN
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4
5 Plaintiff,
6 v.
7 CHARLENE SCOTT,
8 Defendant.

Case No. 2:15-cr-00174-KJD-BNW

**FINDINGS OF FACT,
CONCLUSIONS OF LAW AND
ORDER**

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10 **FINDINGS OF FACT**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore,
12 the Court finds that:

13 1. In January 2024, defendant filed a *pro se* motion for compassionate release.
14 ECF 461. In it, Charlene Scott (“Scott” or “defendant”) raised several reasons she
15 believed early release from custody was warranted. On May 7, 2024, the defense counsel
16 filed a supplement to the motion, along with an exhibit containing Scott’s husband’s
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6 request. The parties agree to the extension of time.

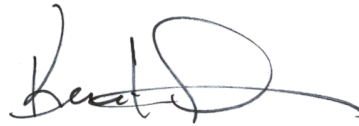
7 6. This is the government's second request to extend the filing deadline to file
8 a responsive pleading to relating to the defendant's compassionate release request. The
9 parties have agreed that the government shall have up to and including June 21, 2024, in
10

1 which to file its response. The additional time requested herein is not sought for purposes
2 of delay, but merely to allow the government sufficient time to file its response.

3 **ORDER**

4 THEREFORE, IT IS HEREBY ORDERED that the government shall have up
5 to and including June 21, 2024 in which to file its response to the Defendant's motion
6 and motion supplement for compassionate release (ECF 461, 473, and 474).
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8 DATED this 10th day of June, 2024.

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11 HONORABLE KENT J. DAWSON
12 United States District Judge
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